



Illinois Environmental Protection Agency P.O. Box 19276, Springfield, IL 62794-9276

217/782-6760

Refer to: L0438020003 Dupage County
Lenz Oil Services
Superfund/Technical

December 24, 1991

EPA Region 5 Records Ctr.



206985

Mark C. Furse
Katten, Muchin & Zavis
525 W. Monroe St. Suite 1600
Chicago Illinois 60606-3693

Dear Mr. Furse:

This letter is in response to Mr. Gowda's comments on the Phase IIB RI/FS Work Plan submitted by ERM-NC Inc, received at IEPA December 13, 1991.

In the second paragraph of Mr. Gowda's letter he refers to paragraph 3 in section 1.0 indicating that the area around the monitoring well G105 was not excavated, when in fact it was only implied as a possible source of contamination in the excavation area. Paragraph 4 in Section (1.0) is referenced here also in this comment, that the extent of contamination could not be determined based on available data. At the beginning of that paragraph SB04, SB08, SB10, and SB11 are stated to not have sufficient recovery of samples for analysis of organics when in fact in the approved RI/FS sampling and analysis plan dated 12/12/90 no organics, PCB's or Pesticides were required to be sampled or analyzed for at any of the above locations, reference Table 3-3.

Analysis of the deeper soil samples within the excavated area were required to have organics sampled for. Their sampling intervals were required to have the section of continuous sample with the highest readings from the HNu sampled for analysis by the lab; reference Table 3-3 described above. The liner was however punctured at these locations with the continuous samplers, including the region directly opposite the liner. These samples may have contained materials that were outside the liner prior to the drilling activities required for sampling, resulting in incorrect data based on the HNu readings on the split spoon samples. Based on the analytical results from these samples Mr. Gowda is proposing to require that additional samples be taken in the above locations at two intervals and have all eight be analyzed for TCL compounds. Sampling in the lower interval of 5-9 feet will not have any conclusive results since the integrity of the liner has been broken previously, apparently allowing contamination from the surroundings to infiltrate into the incinerator ash inside. The maximum depth that any samples can be extracted from in this area is therefor limited by the highest groundwater level recorded since previous field sampling, approximately five feet deep. Any analysis of samples below this level will give no conclusive results as to the source of any contamination.

Bentonite was placed in the borings to try and stop the influx of the groundwater into the lined ash pit after black plastic was found in the samplers. There exists a hydrostatic head at these depths do to the



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groundwater's level being above the base of the lined excavation. Bentonite alone cannot maintain the seal at the liner. The integrity of the liner cannot be repaired, and the infiltration of contamination in the area is inevitable.

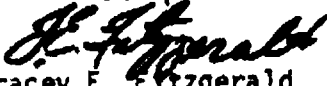
The field location of S812 previously was not in the area of the excavation, this was based on the geology not being ash in nature. This location was originally meant to be in the pit. It is not known whether this is the intent still, or is the contamination surrounding the lined excavation the focus of this sample? Clarification as to the exact location is required prior to sampling.

If the USEPA RPM is to designate the final location of soil samples, he or someone doing his oversight must be onsite to determine the locations and approve any changes in the field due to unforeseen developments.

It appears a group meeting is necessary to finalize the phase 2 Work Plan due to these additional requests. Please convey this to USEPA since you are the contact for us on this site.

If you have any questions please contact me at 217/ 782-6760

Sincerely,


Tracey E. Fitzgerald
Federal Sites Project Manager
Remedial Project Management Section
Division of Land Pollution Control

TEF:0614m,1-2

CC: Division File
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